

**IN THE UNITED STATES BANKRUPTCY COURT  
Northern District of Iowa**

**In the Matter of:**

Brian J. Hansen  
Jennifer A. Hansen,

*Debtors.*

:  
:  
: Case No. 15-01639  
:  
: Chapter 13,  
:  
:

**OBJECTION TO DEBTOR'S CHAPTER 13 SECOND MODIFIED PLAN**

COMES NOW the creditor, James R. Harmeyer, Inc., d/b/a Tyler Homes ("Creditor") and objects to the Debtors' confirmation of its second amended and restated Chapter 13 plan filed August 15, 2016 at Docket No. 51 as follows:

1. Creditor restates objections raised in Docket Nos. 26 and 46 filed February 2, 2016 and June 27, 2016 respectively.
2. Creditor joins the trustee in her objections raised in Docket No. 53 filed September 6, 2016.
3. Section 5 of Debtors' modified plan seeks to devalue Debtors' collateral in an amount to negate James R. Harmeyer Inc.'s allowed secured claim and treat Creditor as unsecured. Creditor objects to this valuation and to this treatment.
4. Debtors plan is proposed not in good faith under the totality of the circumstances.
5. Debtor proposes expenses in Schedule J that are unreasonable.

DATED: September 7, 2016

Respectfully submitted,

/s/ Kevin D. Ahrenholz

Kevin D. Ahrenholz AT0000438  
For BEECHER, FIELD, WALKER,  
MORRIS, HOFFMAN & JOHNSON, P.C.  
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ATTORNEY FOR CREDITOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing instrument was served upon the following persons indicated below:

Daniel M. McDermott, US Trustee  
United States Federal Courthouse  
111 7<sup>th</sup> Avenue SE, Box 17  
Cedar Rapids, IA 52401-2101

Carol F. Dunbar, Trustee  
531 Commercial Street, Ste 500  
Waterloo, IA 50701

Larry S. Eide, Attorney  
Pappajohn, Shriver, Eide & Nielsen P.C.  
103 E State Street, Suite 800  
PO Box 1588  
Mason City, IA 50402-1588

Brian & Jennifer Hansen  
744 12th Avenue NE  
Hampton, IA 50441

by ECF or by enclosing the same in an envelope with postage fully paid, and by depositing said envelope in a United States Postal Service depository in Waterloo, Iowa. I declare under penalty of perjury that the foregoing is true and correct.

Dated this 7th day of September, 2016.

/s/ Haley Close